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February 24, 2015

VIA ECF

Hon. Marilyn D. Go, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room 1214-S
Brooklyn, NY 11201

Re: Calle et al v. ABI Group LLC et al
Index No.: 14-cv-02465 (FB) (MDG)

Your Honor:

Please forgive the lateness of this status report. Although, the Defendants signed the Settlement Agreement approximately three weeks ago the signed agreement was not delivered to the undersigned until Friday, Feb 20, in the late afternoon. The Defendants, upon signing the agreement, unilaterally changed the due dates of the first three payments to "2015" allowing them to make these payments on or before December 31 of this year. Although reasonable due dates were requested, defense counsel has yet to substantively respond to this request. Given the three week delay between the Defendants signing the agreement and the undersigned receiving a copy, I request that if the Defendants do not substantively respond with reasonable due dates for those payments within the next 7 days, that the Court order a conference so that the Parties can address this issue.

Counsel is available at the Court's discretion to discuss any issues involved in this letter.

Respectfully submitted,
Law Offices of William Cafaro

/s/ Amit Kumar
Amit Kumar, Esq. (AK0822)

cc: Steven Ross (via ECF)